

**SUNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*County of Summit, et al. v. Purdue
Pharma L.P., et al*; Case No. 1:18-op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE PLAINTIFFS' OPPOSITION
TO MALLINCKRODT PLC'S
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION UNDER
SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file Plaintiffs' Opposition to Mallinckrodt plc's Motion to Dismiss for Lack of Personal Jurisdiction Under Seal in the above-listed case under seal on June 21, 2019.

Plaintiffs' Omnibus Opposition contains references to confidential information contained in documents produced by Defendants marked as "Confidential" as well as ARCOS data. Plaintiffs file this Motion and Proposed Order (attached as Exhibit A) to ensure compliance with CMO No. 2 (Dkt. No. 441). After filing, Plaintiffs will confer with Defendants and will endeavor to file as soon as practicable on the publicly available docket a version with the least redaction necessary, in accordance with this Court's Protective Orders.

WHEREFORE, Plaintiffs respectfully request that the Honorable Court grant Plaintiffs' Motion for Leave to File Plaintiffs' Opposition to Mallinckrodt plc's Motion to Dismiss for Lack of Personal Jurisdiction Under Seal.

Respectfully Submitted:

DATED: June 21, 2019

/s/ Elizabeth J. Cabraser

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

DATED: June 21, 2019

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser